

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DANIEL RYAN,

Plaintiff,  
v.

GREATER LAWRENCE TECHNICAL SCHOOL,  
JUDY A. DELUCIA AS SHE IS  
SUPERINTENDENT OF GREATER LAWRENCE  
TECHNICAL SCHOOL,  
ELIZABETH FREEDMAN AS SHE IS PRINICPAL  
OF GREATER LAWRENCE TECHNICAL  
SCHOOL, and LINDA K. ZAKAS AS SHE IS  
DIRECTOR OF CURRICULUM AT GREATER  
LAWRENCE TECHNICAL SCHOOL,

Defendants.

Civil Action No. \_\_\_\_\_

**NOTICE OF REMOVAL**

TO THE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS:

Defendants, Greater Lawrence Technical School (the “School”), et al., (collectively  
“Defendants”) respectfully submit that:

1. On or about December 22, 2010, the Defendants agreed to accept service of the  
Complaint in a matter entitled Daniel Ryan v. Greater Lawrence Technical School, et als, Essex  
Superior Court C. A. No. ESCV2010-02532, which was filed in the Massachusetts Superior  
Court, Essex County. A copy of the Complaint is attached hereto as Exhibit A.

2. This Notice is being filed within 30 days of service of the Complaint. The  
time for filing this Notice of Removal under 28 U.S.C. § 1446(b) has not expired.

3. In the Complaint, the Plaintiff asserts, *inter alia*, gender discrimination in violation of Title VII of the Civil Rights Law of 1964 arising out of his separation from employment from the School, in or about June 2009.

4. Accordingly, this Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1441(b), on the grounds that Plaintiff has asserted a federal cause of action under 42, U.S.C. 2000e.

5. Defendants all consent to removal and will notify the Essex County Superior Court and the Plaintiff of this Notice of Removal by filing with the Superior Court a Notice of Filing a Notice of Removal. A copy of that notification, which will be sent to the Essex County Superior Court, is attached hereto as Exhibit B.

Respectfully submitted,

Defendants,  
By their attorneys,

/s/ Christopher J. Campbell  
Christopher J. Campbell (BBO # 630665)  
Jackson Lewis LLP  
75 Park Plaza, 4<sup>th</sup> Floor  
Boston, MA 02116  
(617) 367-0025

DATE: January 6, 2011

**CERTIFICATE OF SERVICE**

This hereby certifies that on January 6, 2011, a copy of the foregoing document was served upon attorney for Plaintiff, Theodore Xenakis, Esquire, 25 Kenoza Avenue, Haverhill, MA 01830 via first-class mail, postage prepaid.

/s/ Christopher J. Campbell  
Jackson Lewis LLP